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November 25, 2024

Via ECF and Email

(ALCarterNYSDChambers@nysd.uscourts.gov); Total Pages: 1

Hon. Andrew L. Carter, Jr., U.S.D.J  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 1306  
New York, NY 10007

Re: Competello v. Kira Labs Inc. et al  
Docket No. 1:24-cv-07941-ALC

Dear Judge Carter:

This office has been retained to represent defendant Iconic Pet LLC ("Defendant") in the above-referenced matter. I have filed my Notice of Appearance on behalf of Defendant for this matter on November 7, 2024.

The Court docket indicates that Defendant's Answer to Complaint was due on November 12, 2024. Pursuant to Paragraph 1(D) of Your Honor's Individual Practice Rules, I am respectfully submitting this letter-motion to request an extension of time to December 23, 2024 to respond to the Complaint. I am requesting this extension so that I can meet with my new client, gather all relevant facts and information, so that I can properly assess this matter, and respond to the Complaint accordingly. In addition, once I have all of the facts and information from my new client, I will also seek to explore the potential for resolution with Plaintiff's counsel.

This is the first request for an extension of time to respond to the Complaint. I have conferred with Plaintiff's counsel, and he has consented to this extension. There are no scheduled dates that could be affected by this extension. Thank you for your kind consideration and courtesies as to this matter.

Respectfully submitted,

/s/ Michael K. Chong

Michael K. Chong, Esq.

MKC/gm  
cc: Plaintiff's counsel (via ECF)